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**BY ECF**

November 7, 2024

The Honorable Pamela K. Chen  
United States District Judge  
United States District Court, Eastern District  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Securities Exchange Commission v. Xia, et al.* U.S. Dist. Ct., Dkt. No. 21-Civ-5350 (PKC)

Dear Judge Chen,

As Your Honor is aware, we represent Defendants Richard Xia (“Xia”) and Fleet New York Metropolitan Regional Center, LLC (“Fleet”) in the above-referenced matter. Through this letter, Defendants wish to update the Court regarding their substantial compliance with its orders.

As of today, Defendants have fully complied with the Court’s orders by submitting all required documentation to the Court-Appointed Receiver. (See Exhibit 1 – Xia Declaration). In compliance with the order dated November 6, 2024, the unredacted bank statements have been submitted to the Court for in-camera inspection.

Additionally, Defendants have remitted all rent payments collected since the Court’s order, totaling \$20,499.22, to the escrow account maintained by Hantman & Associates. This includes invoices for unpaid property tax and common charge expenses amounting to \$15,203.87. These payments, totaling \$20,499.22, has been remitted to the Receiver’s escrow account. Defendants have also fulfilled and submitted all necessary certifications and mortgage documents to the SEC, as required by the Consent Order and as directed by the court’s October 22, 2024 order.

Finally, we have received the attached two letters, from the two witnesses, Qiuxing Xia and Julia Yue, whom we do not represent, but who have informed us that they are seeking counsel and request additional time to respond to subpoenas they have received. (Exhibits A and B)

We appreciate the Court’s attention to this matter and will continue to keep Your Honor updated of any developments that may arise.

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PLEASE SEND ALL CORRESPONDENCE TO THE NEW YORK, NY ADDRESS LISTED ABOVE.

Respectfully submitted,

/s/ Robert J. Hantman, Esq.

*Attorney for Defendant Xia and Fleet*